

FILED

JUN 17 2008

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

JOSE EDUARDO SERRANO-ESPINOZA,

aka "Gato," and "Negro,"

ROGELIO SOBERANIS,

ROSALIO SOBERANIS, aka "Chalillo,"

MARIANO LOPEZ,

ROBERTO CARLOS SILVA LOPEZ,

aka "Shorty,"

HECTOR URBINA,

aka "Papa Noa," "Toro," and "Roman," and

REUBEN ROMO,

aka "Papa," "Joe," "David," and "Texan"

No. 08 CR 241

Violations: Title 21,
United States Code,
Sections 841, 843(b), and
846

JUDGE MANNING**MAGISTRATE JUDGE KEYS****COUNT ONE**

The SPECIAL FEBRUARY 2008-1 GRAND JURY charges:

Beginning no later than in or about the summer of 2006, and continuing until at least
in or about late May 2007, at Chicago, in the Northern District of Illinois, Eastern Division, and
elsewhere,

JOSE EDUARDO SERRANO-ESPINOZA,

aka "Gato," and "Negro,"

ROGELIO SOBERANIS,

ROSALIO SOBERANIS,

aka "Chalillo,"

MARIANO LOPEZ,

ROBERTO CARLOS SILVA LOPEZ,

aka "Shorty,"

HECTOR URBINA,

aka "Papa Noa," "Toro," and "Roman, and

"REUBEN ROMO,

aka "Papa," "Joe," "David," and "Texan,"

defendants herein, conspired with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute and to distribute controlled substances, namely, 500 grams or more of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance, and quantities of mixtures containing heroin, a Schedule I Narcotic Drug Controlled Substance, as well as quantities of mixtures containing marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWO

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about July 26, 2006, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

HECTOR URBINA,
aka "Papa Noa," "Toro," and "Roman,"

defendant herein, knowingly and intentionally distributed a controlled substance, namely, a quantity of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about November 28, 2006, at approximately 8:05 p.m., in the Northern District of Illinois, Eastern Division,

ROGELIO SOBERANIS,

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, United States Code, Section 841(a)(1), namely, distribution of a controlled substance as charged in Count Five of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FOUR

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about December 6, 2006, at approximately 4:48 p.m., in the Northern District of Illinois, Eastern Division,

ROGELIO SOBERANIS,

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, United States Code, Section 841(a)(1), namely, distribution of a controlled substance as charged in Count Five of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FIVE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about December 7, 2006, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE EDUARDO SERRANO-ESPINOZA,
aka "Gato," and "Negro," and
ROGELIO SOBERANIS,

defendants herein, knowingly and intentionally distributed a controlled substance, namely, 500 grams or more of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SIX

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about December 12, 2006, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERTO CARLOS SILVA LOPEZ,
aka "Shorty,"

defendant herein, knowingly and intentionally distributed a controlled substance, namely, a quantity of mixtures containing heroin, a Schedule I Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 5, 2007, at approximately 5:55 p.m., Call Session 254, in the Northern District of Illinois, Eastern Division,

ROBERTO CARLOS SILVA LOPEZ,
aka "Shorty," and
ROGELIO SOBERANIS,

defendants herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 12, 2007, at approximately 4:09 p.m., Call Session 541, in the Northern District of Illinois, Eastern Division,

JOSE EDUARDO SERRANO-ESPINOZA,
aka "Gato," and "Negro,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 13, 2007, at approximately 9:05 p.m., Call Session 588, in the Northern District of Illinois, Eastern Division,

JOSE EDUARDO SERRANO-ESPINOZA,
aka "Gato," and "Negro,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 14, 2007, at approximately 10:58 a.m., Call Session 608, in the Northern District of Illinois, Eastern Division,

MARIANO LOPEZ,

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 14, 2007, at approximately 2:35 p.m., Call Session 627, in the Northern District of Illinois, Eastern Division,

HECTOR URBINA,
aka "Papa Noa," "Toro," and "Roman,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWELVE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 15, 2007, at approximately 12:14 p.m., Call Session 663, in the Northern District of Illinois, Eastern Division,

REUBEN ROMO,
aka "Papa," "Joe," "David," and "Texan,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 19, 2007, at approximately 4:05 p.m., Call Session 906, in the Northern District of Illinois, Eastern Division,

HECTOR URBINA,
aka "Papa Noa," "Toro," and "Roman,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FOURTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 22, 2007, at approximately 8:40 a.m., Call Session 1058, in the Northern District of Illinois, Eastern Division,

REUBEN ROMO,
aka "Papa," "Joe," "David," and "Texan,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 25, 2007, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERTO CARLOS SILVA LOPEZ,
aka "Shorty,"

defendant herein, knowingly and intentionally distributed a controlled substance, namely, a quantity of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about January 25, 2007, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE EDUARDO SERRANO-ESPINOZA,
aka "Gato," and "Negro,"

defendant herein, knowingly and intentionally distributed a controlled substance, namely, a quantity of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about February 8, 2007, at approximately 12:00 p.m., noon, Call Session 55, in the Northern District of Illinois, Eastern Division,

ROSALIO SOBERANIS,
aka "Chalillo,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about February 8, 2007, at approximately 3:58 p.m., Call Session 60, in the Northern District of Illinois, Eastern Division,

ROSALIO SOBERANIS,
aka "Chalillo,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about February 22, 2007, at approximately 10:07 a.m., Call Session 666, in the Northern District of Illinois, Eastern Division,

MARIANO LOPEZ,

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about February 24, 2007, at approximately 12:20 p.m., Call Session 745, in the Northern District of Illinois, Eastern Division,

ROBERTO CARLOS SILVA LOPEZ,
aka "Shorty,"

defendant herein, knowingly and intentionally used a communication facility, namely, a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2008-1 GRAND JURY further alleges:

1. The allegations of Counts 1 through 20 of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 846, 843(b) and 841(a)(1), as alleged in the foregoing Indictment,

JOSE EDUARDO SERRANO-ESPINOZA,
aka "Gato," and "Negro,"
ROGELIO SOBERANIS,
ROSALIO SOBERANIS,
aka "Chalillo,"
MARIANO LOPEZ,
ROBERTO CARLOS SILVA LOPEZ,
aka "Shorty," and
HECTOR URBINA,
aka "Papa Noa," "Toro," and "Roman," and
"REUBEN ROMO,
aka "Papa," "Joe," "David," and "Texan,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds the defendants obtained, directly and indirectly, as a result of the violations; and (2) any and all of property used, and intended to be used, in any manner or part, to commit and facilitate the commission of the violations.

3. The interests of the defendants, subject to forfeiture to the United States

pursuant to Title 21, United States Code, Section 853, include, but are not limited to the following:

- a. \$74,000 in United States Currency, representing the estimated proceeds of the narcotics distribution organization.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY